

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)	CASE NO. 8:21CR212
)	
Plaintiff,)	
)	
vs.)	MOTION TO CONTINUE
)	TRIAL
RAMZI YASSINE,)	
)	
Defendant.)	

COMES NOW the Defendant, Ramzi Yassine, by and through undersigned counsel, and hereby requests a continuance of the trial currently scheduled for September 27, 2021, until December 27, 2021. In support thereof, it is stated as follows:

1. Counsel needs additional time to properly evaluate the discovery material that constitutes the basis of the indictment against the Defendant and to prepare this matter for trial or plea.
2. Assistant United States Attorney, Donald Klein, has no objection to this request.
3. The Defendant requests that the period of delay resulting from this continuance be excluded from speedy trial calculations pursuant to 18 USC §3161 since the ends of justice served by granting the continuance will outweigh the best interest of the public and the defendant in a speedy trial.

WHEREFORE, the Defendant prays the Court grant a continuance of the trial until December 27, 2021, and find that the period of the continuance be excluded from the speedy trial calculation.

Respectfully submitted this 2nd day of September, 2021.

RAMZI YASSINE,
Defendant,

By: s/Sean M. Conway
SEAN M. CONWAY, #23490
Attorneys for Defendant
Dornan, Troia, Howard,
Breitkreutz & Conway, PC LLO
1403 Farnam Street, Suite 232
Omaha, Nebraska 68102
(402) 884-7044 (phone)
(402) 884-7045 (fax)
sean@dtlawyers.com

CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2021, I electronically filed the foregoing Motion with the Clerk of the District Court using the CM/ECF system which sent notification of such filing to the following:

Donald Klein, Assistant United States Attorney

and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

N/A

s/Sean M. Conway
SEAN M. CONWAY, #23490
Attorney for Defendant